

EXHIBIT F

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13 Administration and Kiarash Jam

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 THE WIMBLEDON FUND, SPC
17 (CLASS TT),
18 Plaintiff,

19 v.

20 GRAYBOX, LLC; INTEGRATED
21 ADMINISTRATION; EUGENE
22 SCHER, AS TRUSTEE OF
23 BERGSTEIN TRUST; AND
24 CASCADDE TECHNOLOGIES CORP.,
25 Defendants.

26 THE WIMBLEDON FUND, SPC
27 (CLASS TT),
28 Plaintiff,

v.

DAVID BERGSTEIN, JEROME
SWARTZ, AARON GRUNFELD, AND
KIARASH K. JAM,

Defendants.

CASE NO.: 2:15-CV-6633-CAS-
AJWx

Hon. Christina A. Snyder

**DEFENDANT KIARASH JAM'S
SUPPLEMENTAL RESPONSES
TO PLAINTIFF'S FIRST SET OF
COMBINED WRITTEN
DISCOVERY**



PRELIMINARY STATEMENT

Pursuant to Rules 26, 33, 34 and 36 of the Federal Rules of Civil Procedure, Defendant Kiarash Jam (“Defendant” or “Jam”) hereby responds and objects to Plaintiff’s First Set of Combined Written Discovery, as follows:

GENERAL OBJECTIONS

Jam generally objects to the Combined Written Discovery on each and every one of the following grounds, which are incorporated into and made a part of Jam’s response to each and every Request for Production, Request for Admission, and Interrogatory:

1. Jam objects to the Requests for Production, Requests for Admission, and Interrogatories insofar as they seek documents and/or information belonging to other defendants in this action and/or non-parties, including, but not limited to Advisory IP Services, Inc. f/k/a Swartz IP Services Group, Inc. (“SIP”), Graybox LLC, Cascade Technologies Corp., Integrated Administration, FBO Weston Capital Partners Master Fund, Pineboard Holdings, Inc., Pineboard Funding, Broadway 4D Theaters, Henry N. Jannol and/or the Law Offices of Henry N. Jannol. Such responsive documents, to the extent they exist, are in the possession, custody, or control of those entities or persons and should be obtained by directing discovery at those entities or persons. Jam’s responses and/or production of responsive documents relate only to those documents in Jam’s possession, custody, or control and do not reflect the documents which may or may not be in the possession, custody, or control of other entities or persons.

2. Jam objects to the Combined Written Discovery, and to the Definitions and Instructions set forth therein, to the extent they seek information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, the common interest privilege and/or any other applicable privilege, doctrine, or protection. Jam uses the term “Privilege” in these objections to refer to each and all

1 of these privileges, doctrines, and protections from disclosure; uses the term
2 “Privileged” to refer to any information protected from disclosure by any one or more
3 Privileges; and uses the term “non-privileged” to refer to any information not so
4 protected. Any inadvertent production of Privileged information shall not constitute a
5 waiver of any applicable Privilege.

6 3. Jam objects to the Combined Written Discovery, and to the Definitions
7 and Instructions set forth therein, to the extent they seek to impose obligations upon
8 Jam different from, or in addition to, those obligations imposed by the Federal Rules
9 of Civil Procedure (“FRCP”), the Local Rules for the United States District Court for
10 the Central District of California (“Local Rules”), or the Orders of the Court. Jam’s
11 responses shall be controlled by and comply with the requirements of the Federal
12 Rules of Civil Procedure, the Local Rules, and the Orders of the Court.

13 4. Jam objects to the Combined Written Discovery, and to the Definitions
14 and Instructions set forth therein, to the extent that they use terms that are not defined
15 or understood, or are vaguely and/or ambiguously defined, and therefore fail to
16 identify with reasonable particularity the information sought. Jam will not speculate
17 as to the meaning of such terms.

18 5. Jam objects to the Requests, and to the Definitions and Instructions set
19 forth therein, to the extent they are overbroad, vague, ambiguous, unduly
20 burdensome, oppressive, seek information that is not relevant to the subject matter of
21 this action or to the pled claims or defenses of any party.

22 6. Jam objects to the Requests, and to the Definitions and Instructions set
23 forth therein, to the extent they seek information that constitutes or contains
24 proprietary, confidential, trade secret, third party, or sensitive business information.

25 7. Jam objects to the Requests for Production or Interrogatories to the
26 extent that they call for Jam to create compilations of material or call for matters to be
27 produced in a form or manner other than that kept by Jam in the usual course of
28 business.

1 Jam has not completed his investigation of the facts relating to this case and has
2 not completed its preparation for trial. The following responses are based upon
3 information presently available to Jam and are made without prejudice to Jam's right
4 to utilize subsequently discovered facts.

5
6 Except for explicit facts admitted herein, no incidental or implied admissions
7 are intended hereby. The fact that Jam has answered any interrogatories should not
8 be taken as an admission that Jam accepts or admits the existence of any facts set
9 forth or assumed by such interrogatory, or that such response constitutes admissible
10 evidence. The fact that Jam has answered part or all of any interrogatory is not
11 intended and shall not be construed to be a waiver by Jam of all or any part of any
12 objection to any interrogatory.

13
14 **SUPPLEMENTAL RESPONSES TO FIRST SET OF COMBINED WRITTEN DISCOVERY**

15
16
17 **REQUEST FOR PRODUCTION NO. 1:** All documents and communications
18 between you and Swartz concerning the Fund, the NPA, SIP and/or the Lawsuit.

19 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
20 the Request is overbroad as to time in that it does not specify any time period covered
21 by the Request; (b) the Request is overbroad in scope; (c) the Request seeks
22 information that is protected from disclosure by the attorney-client privilege, attorney
23 work product doctrine, and the common interest privilege; (d) the Request seeks
24 information that is not relevant Plaintiff's claims, including, but not limited to, call
25 documents and communications concerning SIP, the Fund, and the Lawsuit; and (e)
26 the Request seeks confidential and/or proprietary business information relating to SIP.
27 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
28

1 After a diligent search and reasonable inquiry, Jam has no documents responsive to
2 this Request.

3 **REQUEST FOR PRODUCTION NO. 2:** All documents and communications
4 between you and Bergstein concerning the Fund, the NPA, SIP and/or the Lawsuit.

5 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
6 the Request is overbroad as to time in that it does not specify any time period covered
7 by the Request; (b) the Request is overbroad in scope; (c) the Request seeks
8 information that is protected from disclosure by the attorney-client privilege, attorney
9 work product doctrine, and the common interest privilege; (d) the Request seeks
10 information that is not relevant Plaintiff's claims, including, but not limited to, call
11 documents and communications concerning SIP, the Fund, and the Lawsuit; and (e)
12 the Request seeks confidential and/or proprietary business information relating to SIP.

13 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
14 Jam will produce all documents in his possession, custody or control responsive to
15 this Request.
16

17 **REQUEST FOR PRODUCTION NO. 3:** All documents and communications
18 between you and Grunfeld concerning the Fund, the NPA, SIP and/or the Lawsuit.

19 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
20 the Request is overbroad as to time in that it does not specify any time period covered
21 by the Request; (b) the Request is overbroad in scope; (c) the Request seeks
22 information that is protected from disclosure by the attorney-client privilege, attorney
23 work product doctrine, and the common interest privilege; (d) the Request seeks
24 information that is not relevant Plaintiff's claims, including, but not limited to, call
25 documents and communications concerning SIP, the Fund, and the Lawsuit; and (e)
26 the Request seeks confidential and/or proprietary business information relating to SIP.
27 Accordingly, Jam withholds documents based upon the above grounds.
28

1
2 **REQUEST FOR PRODUCTION NO. 4:** All documents and communications
3 between you and any third-party, excluding your counsel, concerning the Fund, the
4 NPA and/or the Lawsuit.

5 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
6 the Request is overbroad as to time in that it does not specify any time period covered
7 by the Request; (b) the Request is overbroad in scope in that it does not identify the
8 individuals or even categories of individuals whose communications are sought; (c)
9 the Request seeks information that is protected from disclosure by the attorney-client
10 privilege, attorney work product doctrine, and the common interest privilege, both in
11 this litigation and in connection with other actions filed by Plaintiff and/or Plaintiff's
12 affiliate; (d) the Request seeks information that is not relevant Plaintiff's claims,
13 including, but not limited to, all documents and communications concerning SIP, the
14 Fund, and the Lawsuit; (e) the Request seeks confidential and/or proprietary business
15 information relating to SIP; and (f) the Request is unduly burdensome, oppressive,
16 and designed solely to harass.

17 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

18 After a diligent search and reasonable inquiry, Jam has no documents in his
19 possession, custody or control responsive to this Request.
20

21 **REQUEST FOR PRODUCTION NO. 5:** All documents and communications
22 between you and the Fund.

23 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
24 the Request is overbroad as to time in that it does not specify any time period covered
25 by the Request; (b) the Request is vague and ambiguous in that it does not identify the
26 communicants at issue; (c) the Request is overbroad as to scope in that it does not
27 identify any subject matter associated with the documents and/or communications; (d)
28

1 in light of the vagueness and ambiguity of the Request, the Request may seek
2 information that is not relevant to Plaintiff's claims; (e) the Request seeks documents
3 that is equally available to Plaintiff and that is already in Plaintiff's possession,
4 custody, or control; and (f) the Request is unduly burdensome, oppressive, and
5 designed solely to harass.

6 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

7 After a diligent search and reasonable inquiry, Jam has no documents in his
8 possession, custody or control responsive to this Request.

9 **REQUEST FOR PRODUCTION NO. 6:** All documents and communications
10 between you and James King concerning the Fund, SIP, the NPA and/or the Lawsuit.

11 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
12 the Request is overbroad as to time in that it does not specify any time period covered
13 by the Request; and (b) the Request seeks documents that are not relevant to
14 Plaintiff's claims.
15

16 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

17 After a diligent search and reasonable inquiry, Jam has no documents in his
18 possession, custody or control responsive to this Request.

19 **REQUEST FOR PRODUCTION NO. 7:** All documents and communications
20 between you and Albert Hallac concerning the Fund, the NPA, SIP and/or the
21 Lawsuit.
22

23 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
24 the Request is overbroad as to time, in that it does not specify any time period
25 covered by the Request; (b) the Request is seeks information that is protected from
26 disclosure by the attorney-client privilege, the attorney work product doctrine and/or
27 the common interest privilege, in connection with other actions filed by Plaintiff's
28 affiliate; and (c) the Request seeks information that is not relevant to Plaintiff's

1 claims.

2 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

3 Jam will produce all documents in his possession, custody or control responsive to
4 this Request.

5 **REQUEST FOR PRODUCTION NO. 8:** All documents and communications
6 between you and Jeffrey Hallac concerning the Fund, the NPA, SIP and/or the
7 Lawsuit.

8
9 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
10 the Request is overbroad as to time, in that it does not specify any time period
11 covered by the Request; (b) the Request is seeks information that is protected from
12 disclosure by the attorney-client privilege, the attorney work product doctrine and/or
13 the common interest privilege, in connection with other actions filed by Plaintiff's
14 affiliate; and (c) the Request seeks information that is not relevant to Plaintiff's
15 claims.

16 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

17 After a diligent search and reasonable inquiry, Jam has no documents in his
18 possession, custody or control responsive to this Request.

19 **REQUEST FOR PRODUCTION NO. 9:** All documents and communications
20 between you and Keith Wellner concerning the Fund, the NPA, SIP and/or the
21 Lawsuit.

22
23 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
24 the Request is overbroad as to time, in that it does not specify any time period
25 covered by the Request; (b) the Request is seeks information that is protected from
26 disclosure by the attorney-client privilege, the attorney work product doctrine and/or
27 the common interest privilege, in connection with other actions filed by Plaintiff's
28 affiliate; and (c) the Request seeks information that is not relevant to Plaintiff's

1 claims.

2 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

3 Jam will produce all documents in his possession, custody or control responsive to
4 this Request.

5 **REQUEST FOR ADMISSION NO. 1:** Admit that you executed the NPA, a true
6 and accurate copy of which is annexed hereto as Exhibit A (Bates labeled WF
7 192601949), on or about November 14, 2011, as SIP's Vice President.

8 **RESPONSE:** Admit.

9
10 **REQUEST FOR PRODUCTION NO. 10:** All documents and communications
11 concerning or relating to your responses to the preceding request for admission.

12 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
13 the Request is vague and ambiguous, (b) the Request seeks information that is
14 protected from disclosure by the attorney-client privilege, the attorney work product
15 doctrine and/or the common interest privilege, both in this action and in related
16 actions filed by Plaintiff and/or Plaintiff's affiliate, (c) the Request is overly broad in
17 that it does not specify the time period covered by the Request, and (d) the Request
18 seeks information that is not relevant to Plaintiff's claims. Accordingly, Jam
19 withholds documents based upon the above grounds.

20 **REQUEST FOR ADMISSION NO. 2:** Admit that you executed certain SIP
21 Reference Notes (the "SIP Notes"), true and accurate copies of which are annexed
22 hereto as Exhibit B (Bates-labeled WF 28-30), on or about November 14, 2011, as
23 SIP's Vice President.

24 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
25 the Request is vague and ambiguous in that it is unclear whether the Request seeks to
26 attribute Jam's conduct on behalf of SIP as conduct of Jam personally.

27
28 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

1 Admits that he executed the Notes.

2 **REQUEST FOR PRODUCTION NO. 11:** All documents and communications
3 concerning or relating to your responses to the preceding request for admission.

4 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
5 the Request is vague and ambiguous, (b) the Request seeks information that is
6 protected from disclosure by the attorney-client privilege, the attorney work product
7 doctrine and/or the common interest privilege, both in this action and in related
8 actions filed by Plaintiff and/or Plaintiff's affiliate, and (c) the Request is overly
9 broad in that it does not specify the time period covered by the Request. Accordingly,
10 Jam withholds documents based upon the above grounds.

11 **REQUEST FOR ADMISSION NO. 3:** Admit that by way of correspondence dated
12 November 17, 2011, a true and accurate copy of which is annexed hereto as Exhibit C
13 (Bates-labeled WF290-291), you advised Weston Capital Management LLC and/or
14 Weston Capital Asset Management, LLC that \$5 million of the Fund's initial
15 investment in SIP would remain in cash or liquid investments until the SIP Notes
16 matured or redemption were requested
17

18 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
19 the Request is vague and ambiguous in that it is unclear whether the Request seeks to
20 attribute Jam's conduct on behalf of SIP as conduct of Jam personally.

21 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

22 Admits that he signed the letter dated November 17, 2011, and further responds that
23 the letter speaks for itself.
24

25 **REQUEST FOR PRODUCTION NO. 12:** All documents and communications
26 concerning or relating to your response to the preceding request for admission.

27 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
28 the Request seeks information that is protected from disclosure by the attorney-client

1 privilege, the attorney work product doctrine, and/or the common interest privilege,
2 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate,
3 (b) the Request is vague and ambiguous as to whether it seeks documents and
4 communications relating to Jam's response or seeks information underlying the
5 response, and (c) the Request seeks documents not relevant to Plaintiff's claims. .
6 Accordingly, Jam withholds documents based upon the above grounds.

7 **REQUEST FOR ADMISSION NO. 4:** Admit that less than \$5 million of the
8 Fund's initial investment in SIP remained in cash or liquid investments until the SIP
9 Notes matured or redemptions were requested.

10 **RESPONSE:** Jam lacks knowledge or information as to the matter in the Request,
11 and after reasonable inquiry the information known or readily available to Jam is
12 insufficient to enable Jam to admit or deny said Request.

13 **REQUEST FOR PRODUCTION NO. 13:** All documents and communications
14 concerning or relating to your response to the preceding request for admission.

15 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
16 the Request seeks information that is protected from disclosure by the attorney-client
17 privilege, the attorney work product doctrine, and/or the common interest privilege,
18 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
19 (b) the Request seeks information that is not relevant to Plaintiff's claim; and (d) the
20 Request is more appropriately directed to non-party SIP, not to Jam.
21

22 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
23 After a diligent search and reasonable inquiry, Jam has no documents in his
24 possession, custody or control responsive to this Request.

25 **REQUEST FOR ADMISSION NO. 5:** Admit that you are an owner of K. Jam
26 Media, and have been since its inception.
27

28 **RESPONSE:** Jam specifically objects to this Request on the grounds: (a) the

1 Request is vague and ambiguous as to the meaning of the term "owner", and the
2 Request is overly broad as to time. Subject to, and without waiving the foregoing
3 objections, Jams responds, as follows: Admit.

4 **INTERROGATORY NO. 1:** To the extent that your response to the preceding
5 request for admission is anything other than an unqualified admission, explain the
6 complete factual basis for your response, including an explanation of your former and
7 current roles in K. Jam Media.

8 **RESPONSE:** Inapplicable.

9 **REQUEST FOR PRODUCTION NO. 14:** All documents and communications
10 concerning or relating to your response to the preceding request for admission.

11 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
12 the Request seeks information that is protected from disclosure by the attorney-client
13 privilege, the attorney work product doctrine, and/or the common interest privilege,
14 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
15 (b) the Request seeks information that is not relevant to Plaintiff's claim
16

17 Accordingly, Jam withholds documents based upon the above grounds.

18 **REQUEST FOR ADMISSION NO. 6:** Admit that you currently hold, or previously
19 have held, the title of Vice President of SIP.

20 **RESPONSE:** Admit

21 **INTERROGATORY NO. 2:** To the extent that your response to the preceding
22 request for admission is anything other than an unqualified admission, explain the
23 complete factual basis for your response, including an explanation of your former and
24 current roles in SIP.
25

26 **RESPONSE:** Inapplicable.
27
28

1 **REQUEST FOR PRODUCTION NO. 15:** All documents and communications
2 concerning or relating to your response to the preceding interrogatory.

3 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
4 the Request seeks information that is protected from disclosure by the attorney-client
5 privilege, the attorney work product doctrine, and/or the common interest privilege,
6 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
7 (b) the Request is overbroad as to time because it seeks information outside of the
8 relevant time period. Accordingly, Jam withholds documents based upon the above
9 grounds.

10 **INTERROGATORY NO. 3:** Identify, by name and address, all former and current
11 officers, directors, shareholders and employees of SIP since December 1, 2010.

12 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
13 the Interrogatory seeks information that should be directed to non-party SIP and not
14 to Jam; and (c) the Interrogatory is overbroad as to time because it seeks information
15 outside of the relevant time period.

16
17 Subject to, and without waiving, the foregoing objections, Jam responds based upon
18 the information known or available to him, as follows: David Bergstein, who can be
19 contacted through his attorneys of record was a director, and officer of SIP; Jam, who
20 can be contacted through his attorneys of record, who was a Vice President of SIP
21 from approximately November 2011 to June 2012.

22 **REQUEST FOR PRODUCTION NO. 16:** All documents and communications
23 concerning or relating to your response to the preceding interrogatory.

24 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
25 the Request is vague and ambiguous regarding the scope of documents sought; (b) as
26 written, the Request is overbroad as to scope because it purports to seek production of
27 all documents related to all former and current officers, directors, shareholders and
28

1 employees of SIP; (c) the Request is overbroad as to time because it seeks documents
2 outside of the relevant time period; and (d) the Request seeks information that is
3 protected from disclosure by the attorney-client privilege, the attorney work product
4 doctrine, and/or the common interest privilege, both in this action and in connection
5 with related actions filed by Plaintiff and/or Plaintiff's affiliate. Subject to, and
6 without waiving, the foregoing objections, Jam responds, as follows: After a diligent
7 search and reasonable inquiry, Jam has no documents in his possession, custody or
8 control responsive to this Request.

9 **INTERROGATORY NO. 4:** Identify every banking and investment account, by
10 financial institution and account number, held in the name of, or on behalf of, SIP
11 since December 1, 2010.

12 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

13 (a) the Interrogatory seeks confidential and proprietary business information
14 belonging to SIP; (b) the Interrogatory seeks information that is not relevant to
15 Plaintiff's claims; (d) the Interrogatory is overbroad as to time in that it seeks
16 information outside of the relevant time period; and (d) the Interrogatory is more
17 appropriately directed toward non-party SIP.

18 **REQUEST FOR PRODUCTION NO. 17:** All documents and communications
19 concerning or relating to your response to the preceding interrogatory.

20 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
21 the Request seeks confidential and proprietary business and financial information
22 belonging to SIP; (b) the Request seeks documents that are more likely in the
23 possession, custody, or control of third parties, including SIP; (c) the Request seeks
24 documents that are not relevant to Plaintiff's claims; (d) the Request is overbroad as
25 to time because it seeks information outside of the relevant time period; and (g) the
26 Request is overbroad as to scope.

27 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
28

1 After a diligent search and reasonable inquiry, Jam has no documents in his
2 possession, custody or control responsive to this Request.

3 **INTERROGATORY NO. 5:** For every SIP board meeting held since December 1,
4 2010, identify the following: (i) the date; (ii) the location where the meeting was
5 held; (iii) the individual who called for the meeting; (iv) all agenda items for the
6 meeting; and (v) all resolutions passed at the meeting, if any.

7 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

8 (a) the Interrogatory seeks confidential and proprietary business information
9 belonging to SIP; (b) the Interrogatory is more appropriately directed to SIP, not to
10 Jam; (c) the Interrogatory is overbroad as to time because it seeks information
11 regarding board meetings outside of the relevant time period; (d) to the extent the
12 Interrogatory seeks information regarding the substance of the SIP Board meetings,
13 the Interrogatory seeks information that is not relevant to Plaintiff's claims; and (e)
14 the Interrogatory seeks information that is protected from disclosure by the attorney-
15 client privilege, the attorney work product doctrine, and/or the common interest
16 doctrine, both in this action and in related actions filed by Plaintiff and/or Plaintiff's
17 affiliate.

18 **REQUEST FOR PRODUCTION NO. 18:** All documents and communications
19 concerning or relating to your response to the preceding interrogatory.

20 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
21 the Request seeks confidential and proprietary business information belonging to SIP;
22 (b) the Request is more appropriately directed to SIP, not to Jam; (c) the Request is
23 overbroad as to time because it seeks information regarding board meetings outside of
24 the relevant time period; (d) the Request seeks information that is not relevant to
25 Plaintiff's claims; and (e) the Request seeks information that is protected from
26 disclosure by the attorney-client privilege, the attorney work product doctrine and/or
27 the common interest doctrine, both in this action and in related actions filed by
28

1 Plaintiff and/or Plaintiff's affiliate.

2 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

3 After a diligent search and reasonable inquiry, Jam has no documents in his
4 possession, custody or control responsive to this Request.

5 **INTERROGATORY NO. 6:** Identify all leases as to which SIP was a party since
6 December 1, 2010.

7
8 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

9 (a) the Interrogatory is more appropriately directed to non-party SIP, not to Jam; (b)
10 the Interrogatory seeks information that is not relevant to Plaintiff's claims; (c) the
11 Interrogatory is overbroad because it seeks information outside of the relevant time
12 period; (d) the Interrogatory is vague and ambiguous as to the information sought by
13 the undefined term "identify."

14 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

15 Jam has no information or knowledge with regard to the subject matter of the above
16 Interrogatory.

17 **REQUEST FOR PRODUCTION NO. 19:** All documents and communications
18 concerning or relating to your response to the preceding interrogatory.

19
20 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
21 the Request is more appropriately directed to non-party, SIP, not to Jam; (b) the
22 Request seeks information that is not relevant to Plaintiff's claims; and (c) the
23 Request is overbroad because it seeks information outside of the relevant time period.

24 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

25 After a diligent search and reasonable inquiry, Jam has no documents in his
26 possession, custody or control responsive to this Request.
27

1 **INTERROGATORY NO. 7:** Identify all real property owned at any point in time
2 by SIP since December 1, 2010.

3 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

4 (a) the Interrogatory is more appropriately directed at non-party, SIP, not to Jam; (b)
5 the Interrogatory is overbroad because it seeks information outside of the relevant
6 time period; (c) the Interrogatory seeks information that is not relevant to Plaintiff's
7 claims; and (d) the Interrogatory is vague and ambiguous as to the information sought
8 by the undefined term "identify."

9 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

10 Jam has no information or knowledge with regard to the subject matter of the above
11 Interrogatory.

12
13 **REQUEST FOR PRODUCTION NO. 20:** All documents and communications
14 concerning or relating to your response to the preceding interrogatory.

15 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
16 the Request is more appropriately directed to non-party, SIP, not to Jam; (b) the
17 Request is overbroad because it seeks information outside of the relevant time period;
18 and (c) the Request seeks information that is not relevant Plaintiff's claims.

19 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

20 After a diligent search and reasonable inquiry, Jam has no documents in his
21 possession, custody or control responsive to this Request.

22
23 **INTERROGATORY NO. 8:** Identify all SIP clients, if any, since December 1,
24 2010.

25 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

26 (a) the Interrogatory is more appropriately directed to non-party, SIP, not to Jam; (b)
27 the Interrogatory is overbroad as to time because it seeks information outside of the
28 relevant time period; (c) the Interrogatory seeks information that is not relevant to

1 Plaintiff's claims; (d) the Interrogatory is vague and ambiguous as to the undefined
2 terms "identify" and "clients;" and (e) the Interrogatory seeks confidential,
3 proprietary, and/or trade secret information belonging to SIP.

4 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

5 Jam has no information or knowledge with regard to the subject matter of the above
6 Interrogatory.

7 **REQUEST FOR PRODUCTION NO. 21:** All documents and communications
8 concerning or relating to your response to the preceding interrogatory.
9

10 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
11 the Request is more appropriately directed to non-party, SIP, not to Jam; (b) the
12 Request is overbroad as to time because it seeks information outside of the relevant
13 time period; (c) the Request seeks information that is not relevant to Plaintiff's
14 claims; (d) the Request is vague and ambiguous as to the undefined term "clients;" (e)
15 the Request is further vague and ambiguous as to the documents and communications
16 sought, i.e., whether the Request seeks all documents and/or communications that
17 concern or relate to SIP's "clients" or whether the Request seeks documents and/or
18 communications sufficient to identify SIP's "clients" by name and/or contact
19 information; (f) to the extent that the Request seeks all documents and
20 communications that concern or relate to SIP's "clients," the Request is overbroad,
21 unduly burdensome, and designed solely to harass; (g) to the extent that the Request
22 seeks all documents and communications that concern or relate to SIP's "clients," the
23 Request seeks confidential, proprietary, and/or personal private information belonging
24 to SIP's "clients;" and (h) the Request seeks confidential, proprietary, and/or trade
25 secret information belonging to SIP.

26 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

27 After a diligent search and reasonable inquiry, Jam has no documents in his
28

1 possession, custody or control responsive to this Request.

2 **INTERROGATORY NO. 9:** For every loan issued by SIP since December 1, 2010,
3 identify the following: (i) to whom the loan was made; (ii) the date of the loan; (iii)
4 the loan amount; (iv) the term of the loan; (v) how much, if any, of the loan has been
5 repaid; and (vi) the purpose of the loan.

6 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:
7 (a) the Interrogatory is more appropriately directed to non-party, SIP, not to Jam; (b)
8 the Interrogatory is overbroad as to time because it seeks information outside of the
9 relevant time period; (c) the Interrogatory seeks information that is not relevant to
10 Plaintiff's claims; and (d) the Interrogatory seeks confidential, proprietary, and/or
11 trade secret information belonging to SIP.

12 **REQUEST FOR PRODUCTION NO. 22:** All documents and communications
13 concerning or relating to your response to the preceding interrogatory.

14
15 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
16 the Request is more appropriately directed to non-party, SIP, not to Jam; (b) the
17 Request is overbroad as to time because it seeks information outside of the relevant
18 time period; (c) the Request seeks information that is not relevant to Plaintiff's
19 claims; (d) the Request is further vague and ambiguous as to the documents and
20 communications sought, i.e., whether the Request seeks all documents and/or
21 communications that concern or relate to loans issued by SIP or whether the Request
22 seeks documents and/or communications sufficient to identify the loans; (e) to the
23 extent that the Request seeks all documents and communications that concern or
24 relate to loans issued by SIP, the Request is overbroad, unduly burdensome, and
25 designed solely to harass; and (f) the Request seeks confidential, proprietary, and/or
26 trade secret information belonging to SIP.

1 **INTERROGATORY NO. 10:** For every loan received by SIP since December 1,
2 2010, identify the following: (i) by whom the loan was made; (ii) the date of the loan;
3 (iii) the loan amount; (iv) the term of the loan; (v) how much, if any, of the loan has
4 been repaid; and (vi) the purpose of the loan.

5 **RESPONSE** Jam specifically objects to this Interrogatory on the following grounds:

6 (a) the Interrogatory is more appropriately directed to non-party, SIP, not to Jam; (b)
7 the Interrogatory is overbroad as to time because it seeks information outside of the
8 relevant time period; (c) the Interrogatory seeks information that is not relevant to
9 Plaintiff's claims; and (d) the Interrogatory seeks confidential, proprietary, and/or
10 trade secret information belonging to SIP.

11 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

12 Jam has no information or knowledge with regard to the subject matter of the above
13 Interrogatory.
14

15 **REQUEST FOR PRODUCTION 23:** All documents and communications
16 concerning or relating to your response to the preceding interrogatory.

17 **RESPONSE** Jam specifically objects to this Request on the following grounds: (a)
18 the Request is more appropriately directed to non-party, SIP, not to Jam; (b) the
19 Request is overbroad as to time because it seeks information outside of the relevant
20 time period; (c) the Request seeks information that is not relevant to Plaintiff's
21 claims; (d) the Request is further vague and ambiguous as to the documents and
22 communications sought, i.e., whether the Request seeks all documents and/or
23 communications that concern or relate to loans received by SIP or whether the
24 Request seeks documents and/or communications sufficient to identify the loans; (e)
25 to the extent that the Request seeks all documents and communications that concern
26 or relate to loans received by SIP, the Request is overbroad, unduly burdensome, and
27 designed solely to harass; and (g) the Request seeks confidential, proprietary, and/or
28 trade secret information belonging to SIP. 20

1 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

2 After a diligent search and reasonable inquiry, Jam has no documents in his
3 possession, custody or control responsive to this Request.

4 **INTERROGATORY NO. 11:** For every equity investment received by SIP since
5 December 1, 2010, identify the following: (i) by whom the equity investment was
6 made; (ii) the date of the equity investment; (iii) the equity investment amount; and
7 (iv) the purpose of the equity investment.

8 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

9 (a) the Interrogatory is more appropriately directed to non-party, SIP, not to Jam; (b)
10 the Interrogatory is overbroad as to time because it seeks information outside of the
11 relevant time period; (c) the Interrogatory seeks information that is not relevant to
12 Plaintiff's claims; and (d) the Interrogatory seeks confidential, proprietary, and/or
13 trade secret information belonging to SIP.

14
15 **REQUEST FOR PRODUCTION NO. 24:** All documents and communications
16 concerning or relating to your response to the preceding interrogatory.

17 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
18 the Request is more appropriately directed to non-party, SIP, not to Jam; (b) the
19 Request is overbroad as to time because it seeks information outside of the relevant
20 time period; (c) the Request seeks information that is not relevant to Plaintiff's
21 claims; (d) the Request is further vague and ambiguous as to the documents and
22 communications sought, i.e., whether the Request seeks all documents and/or
23 communications that concern or relate to equity investments received by SIP or
24 whether the Request seeks documents and/or communications sufficient to provide
25 the information requested in the Interrogatory No. 11; (e) to the extent that the
26 Request seeks all documents and communications that concern or relate to equity
27 investments received by SIP, the Request is overbroad, unduly burdensome, and
28 designed solely to harass; and (f) the Request seeks confidential, proprietary, and/or

1 trade secret information belonging to SIP.

2 **INTERROGATORY NO. 12:** Identify all capital contributions you have made to
3 SIP since December 1, 2010, including: (i) the date; (ii) the amount requested by SIP;
4 (iii) the amount you provided to SIP; (iv) the identity of any other individual or entity
5 providing a contribution, including the amount; and (v) the designated purpose for the
6 contribution;

7 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

8 (a) insofar as the Interrogatory seeks information regarding the identity of other
9 individuals or entities providing capital contributions to SIP, the Interrogatory seeks
10 personal and private information which invades the privacy rights of third parties; (b)
11 the Interrogatory is overbroad as to time because it seeks information outside of the
12 relevant time period; and (c) insofar as the Interrogatory seeks information regarding
13 the identify of other individuals or entities providing capital contributions to SIP, the
14 Interrogatory should be directed at non-party SIP, and not to Jam.

15 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

16 None.
17

18 **REQUEST FOR PRODUCTION NO. 25:** All documents and communications
19 concerning or relating to your response to the preceding interrogatory.

20 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
21 the Request seeks personal and private information which invades the privacy rights
22 of third parties; (b) the Request is overbroad as to time because it seeks information
23 outside of the relevant time period; (c) the Request is more properly directed toward
24 non-party SIP, and not to Jam; (d) the scope of the Request is vague and ambiguous;
25 for example, it is unclear whether the Request seeks documents and communications
26 sufficient to identify the information requested in Interrogatory No. 12, if it seeks all
27 documents and communications regarding all capital contributions to SIP, or if it
28

1 seeks all documents and communications regarding any person or entity that has
2 made a capital contribution to SIP; (e) the Request seeks confidential and proprietary
3 business information belonging to SIP; and (f) the Request seeks information that is
4 protected from disclosure by the attorney-client privilege, the attorney work product
5 doctrine, and the common interest privilege, both in this action and in related actions
6 filed by Plaintiff and/or Plaintiff's affiliate.

7 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

8 After a diligent search and reasonable inquiry, Jam has no documents in his
9 possession, custody or control responsive to this Request.

10 **INTERROGATORY NO. 13:** Identify all transfers of funds received by you and/or
11 K. Jam Media from SIP since December 1, 2010, including the date, amount and
12 purpose for each such transfer.
13

14 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

15 (a) the Interrogatory is overbroad as to time because it seeks information outside of
16 the relevant time period.

17 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

18 None.

19 **REQUEST FOR PRODUCTION NO. 26:** All documents and communications
20 concerning or relating to your response to the preceding interrogatory.
21

22 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
23 the Request is overbroad as to time in that it seeks information outside of the relevant
24 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
25 whether the Request seeks all documents and communications relating to the transfers
26 identified in Interrogatory No. 13 or if the Request only seeks documents and
27 communications sufficient to identify the transfers identified in response to
28 Interrogatory No. 13; (c) to the extent the Request seeks all documents and

1 communications relating to all transfers, including the purpose of the transfers, the
2 Request seeks confidential and proprietary business information belonging to non-
3 party SIP; and (d) the Request seeks personal, confidential and private information
4 belonging to Jam.

5 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

6 After a diligent search and reasonable inquiry, Jam has no documents in his
7 possession, custody or control responsive to this Request.

8 **INTERROGATORY NO. 14:** Identify all transfers of funds made by you to SIP
9 since December 1, 2010, including the date, amount and purpose for each such
10 transfer.

11 **RESPONSE:** None.

12 **REQUEST FOR PRODUCTION NO. 27:** All documents and communications
13 concerning or relating to your response to the preceding interrogatory.

14 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
15 the Request is overbroad as to time in that it seeks information outside of the relevant
16 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
17 whether the Request seeks all documents and communications relating to the transfers
18 identified in response to Interrogatory No. 14 or if the Request only seeks documents
19 and communications sufficient to identify the transfers identified in response to
20 Interrogatory No. 14; (c) to the extent the Request seeks all documents and
21 communications relating to all transfers, including the purpose of the transfers, the
22 Request seeks confidential and proprietary business information belonging to non-
23 party SIP; and (d) the Request seeks personal, confidential and private information
24 belonging to Jam.

25 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

26 After a diligent search and reasonable inquiry, Jam responds that no documents in his
27
28

1 possession, custody or control responsive to this Request.

2 **INTERROGATORY NO. 15:** Identify all transfers of funds received by Graybox
3 LLC from SIP since December 1, 2010, including the date, amount and purpose of
4 each such transfer, and the consideration (i.e., goods, services, etc.) that SIP received
5 in exchange therefor.

6 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

7 (a) (b) the Interrogatory is overbroad as to time because it seeks information outside
8 of the relevant time period; (b) the Interrogatory is more properly directed at non-
9 parties SIP and/or Graybox, LLC, and not to Jam; and (c) the Interrogatory seeks
10 information that is not relevant to Plaintiff's claims.

11 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

12 Jam has no information or knowledge with regard to the subject matter of the above
13 Interrogatory.
14

15 **REQUEST FOR PRODUCTION NO. 28:** All documents and communications
16 concerning or relating to your response to the preceding interrogatory.

17 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
18 the Request is overbroad as to time in that it seeks information outside of the relevant
19 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
20 whether the Request seeks all documents and communications relating to the transfers
21 identified in response to Interrogatory No. 15 or if the Request only seeks documents
22 and communications sufficient to identify the transfers identified in response to
23 Interrogatory No. 15; (c) to the extent the Request seeks all documents and
24 communications relating to all transfers, including the purpose of the transfers, the
25 Request seeks confidential and proprietary business information belonging to non-
26 parties SIP and/or Graybox, LLC; (d) the Request is more appropriately directed
27 toward non-parties SIP and/or Graybox, LLC, and not to Jam; (e) the Request seeks
28

1 information that is protected from disclosure by the attorney-client privilege, the
2 attorney work product doctrine, and/or the common interest privilege, both in this
3 action and in other related actions filed by Plaintiff and/or Plaintiff's affiliate; and (f)
4 the Request seeks documents that are not relevant to Plaintiff's claim.

5 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

6 After a diligent search and reasonable inquiry, Jam responds that no documents in his
7 possession, custody or control responsive to this Request.

8 **INTERROGATORY NO. 16:** Identify all transfers of funds received by Eugene
9 Scher as Trustee for the Bergstein Trust from SIP since December 1, 2010, including
10 the date, amount and purpose of each such transfer, and the consideration (i.e., goods,
11 services, etc.) that SIP received in exchange therefor.

12 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

13 (a) the Interrogatory is overbroad as to time because it seeks information outside of
14 the relevant time period; and (b) the Interrogatory is more properly directed at Eugene
15 Scher and/or non-party SIP, and not to Jam.

16 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

17 Jam has no information or knowledge with regard to the subject matter of the above
18 Interrogatory.

19 **REQUEST FOR PRODUCTION NO. 29:** All documents and communications
20 concerning or relating to your response to the preceding interrogatory.

21 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
22 the Request is overbroad as to time in that it seeks information outside of the relevant
23 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
24 whether the Request seeks all documents and communications relating to the transfers
25 identified in response to Interrogatory No. 16 or if the Request only seeks documents
26 and communications sufficient to identify the transfers identified in response to
27
28

1 Interrogatory No. 16; (c) to the extent the Request seeks all documents and
2 communications relating to all transfers, including the purpose of the transfers, the
3 Request seeks confidential and proprietary business information belonging to non-
4 party SIP; (d) to the extent the Request seeks all documents and communications
5 relating to all transfers, including the purpose of the transfers, the Request seeks
6 confidential and private information relating to Eugene Scher, as Trustee of the
7 Bergstein Trust; (e) the Request is more appropriately directed to Eugene Scher
8 and/or non-party SIP, and not to Jam; and (f) the Request seeks information that is
9 protected from disclosure by the attorney-client privilege, the attorney work product
10 doctrine, and the common interest privilege, in this action and in related actions filed
11 by Plaintiff and/or Plaintiff's affiliate.

12 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

13 After a diligent search and reasonable inquiry, Jam responds that no documents in his
14 possession, custody or control responsive to this Request.

15 **INTERROGATORY NO. 17:** Identify all transfers of funds received by Cascade
16 Technologies Corp. from SIP since December 1, 2010, including the date, amount and
17 purpose of each such transfer, and the consideration (i.e., goods, services, etc.) that
18 SIP received in exchange therefor.

19 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

20 (a) the Interrogatory is overbroad as to time because it seeks information outside of
21 the relevant time period; (b) the Interrogatory is more properly directed at non-parties
22 SIP and/or Cascade Technologies Corp. ("Cascade"), and not to Jam; and (c) the
23 Interrogatory seeks information that is not relevant to Plaintiff's claim.

24 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

25 Jam has no information or knowledge with regard to the subject matter of the above
26 Interrogatory.
27
28

1 **REQUEST FOR PRODUCTION NO. 30:** All documents and communications
2 concerning or relating to your response to the preceding interrogatory.

3 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
4 the Request is overbroad as to time in that it seeks information outside of the relevant
5 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
6 whether the Request seeks all documents and communications relating to the transfers
7 identified in response to Interrogatory No. 17 or if the Request only seeks documents
8 and communications sufficient to identify the transfers identified in response to
9 Interrogatory No. 17; (c) to the extent the Request seeks all documents and
10 communications relating to all transfers, including the purpose of the transfers, the
11 Request seeks confidential and proprietary business information belonging to non-
12 parties SIP and/or Cascade; (d) the Request is more appropriately directed toward
13 non-parties SIP and/or Cascade, and not to Jam; (e) the Request seeks information
14 that is protected from disclosure by the attorney-client privilege, the attorney work
15 product doctrine, and/or the common interest privilege, both in this action and in
16 other related actions filed by Plaintiff and/or Plaintiff's affiliate; and (f) the Request
17 seeks information that is not relevant to Plaintiff's claim.

18 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

19 After a diligent search and reasonable inquiry, Jam responds that he has no documents
20 in his possession, custody or control responsive to this Request.
21

22 **INTERROGATORY NO. 18:** Identify all transfers of funds received by Integrated
23 Administration from SIP since December 1, 2010, including the date, amount and
24 purpose of each such transfer, and the consideration (i.e., goods, services, etc.) that
25 SIP received in exchange therefor.

26 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:
27 (a) the Interrogatory is overbroad as to time because it seeks information outside of
28 the relevant time period; (b) the Interrogatory is more properly directed at non-parties

1 SIP and/or Integrated Administration (“Integrated”), and not to Jam; and (c) the
2 Interrogatory seeks information that is not relevant to Plaintiff’s claim.

3 **REQUEST FOR PRODUCTION NO. 31:** All documents and communications
4 concerning or relating to your response to the preceding interrogatory.

5 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
6 the Request is overbroad as to time in that it seeks information outside of the relevant
7 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
8 whether the Request seeks all documents and communications relating to the transfers
9 identified in response to Interrogatory No. 18 or if the Request only seeks documents
10 and communications sufficient to identify the transfers identified in response to
11 Interrogatory No. 18; (c) to the extent the Request seeks all documents and
12 communications relating to all transfers, including the purpose of the transfers, the
13 Request seeks confidential and proprietary business information belonging to non-
14 parties SIP and/or Integrated; (d) the Request is more appropriately directed toward
15 non-parties SIP and/or Integrated, and not to Jam; (e) the Request seeks information
16 that is protected from disclosure by the attorney-client privilege, the attorney work
17 product doctrine, and/or the common interest privilege, both in this action and in
18 other related actions filed by Plaintiff and/or Plaintiff’s affiliate; and (f) the Request
19 seeks documents that are not relevant to Plaintiff’s claim.

20 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
21

22 Accordingly, Jam withholds documents based upon the above grounds.

23 **INTERROGATORY NO. 19:** Identify all transfers of funds received by FBO
24 Weston Capital Partners Master Fund from SIP since December 1, 2010, including
25 the date, amount and purpose of each such transfer, and the consideration (i.e., goods,
26 services, etc.) that SIP received in exchange therefor.

1 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

2 (a) the Interrogatory is overbroad as to time because it seeks information outside of
3 the relevant time period; (b) the Interrogatory is more properly directed at non-parties
4 SIP and/or FBO Weston Capital Partners Master Fund ("Weston Capital Partners"),
5 and not to Jam; and (c) the Interrogatory seeks information that is not relevant to
6 Plaintiff's claim.

7 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

8 Jam has no information or knowledge with regard to the subject matter of the above
9 Interrogatory.

10 **REQUEST FOR PRODUCTION NO. 32:** All documents and communications
11 concerning or relating to your response to the preceding interrogatory.

12
13 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
14 the Request is overbroad as to time in that it seeks information outside of the relevant
15 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
16 whether the Request seeks all documents and communications relating to the transfers
17 identified in response to Interrogatory No.19 or if the Request only seeks documents
18 and communications sufficient to identify the transfers identified in response to
19 Interrogatory No. 19; (c) to the extent the Request seeks all documents and
20 communications relating to all transfers, including the purpose of the transfers, the
21 Request seeks confidential and proprietary business information belonging to non-
22 parties SIP and/or Weston Capital Partners; (d) the Request is more appropriately
23 directed toward non-parties SIP and/or Weston Capital Partners, and not to Jam; (e)
24 the Request seeks information that is protected from disclosure by the attorney-client
25 privilege, the attorney work product doctrine, and/or the common interest privilege,
26 both in this action and in other related actions filed by Plaintiff and/or Plaintiff's
27 affiliate; and (f) the Request seeks documents that are not relevant to Plaintiff's claim.

28 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

1 After a diligent search and reasonable inquiry, Jam responds that he has no documents
2 in his possession, custody or control responsive to this Request.

3 **INTERROGATORY NO. 20:** Identify all transfers of funds received by Pineboard
4 Holdings, Inc. and/or Pineboard Funding from SIP since December 1, 2010, including
5 the date, amount and purpose of each such transfer, and the consideration (i.e., goods,
6 services, etc.) that SIP received in exchange therefor.

7 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:
8 (a) the Interrogatory is overbroad as to time because it seeks information outside of
9 the relevant time period; (b) the Interrogatory is more properly directed at non-parties
10 SIP and/or Pineboard Holdings, Inc. and/or Pineboard Funding (with Pineboard
11 Holdings, Inc., "Pineboard"), and not to Jam; and (c) the Interrogatory seeks
12 information that is not relevant to Plaintiff's claim.

13 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
14
15 Jam believes that SIP paid to Pineboard \$50,000 in or about March 2012.

16 **REQUEST FOR PRODUCTION NO. 33:** All documents and communications
17 concerning or relating to your response to the preceding interrogatory.

18 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
19 the Request is overbroad as to time in that it seeks information outside of the relevant
20 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
21 whether the Request seeks all documents and communications relating to the transfers
22 identified in response to Interrogatory No. 20 or if the Request only seeks documents
23 and communications sufficient to identify the transfers identified in response to
24 Interrogatory No. 20; (c) to the extent the Request seeks all documents and
25 communications relating to all transfers, including the purpose of the transfers, the
26 Request seeks confidential and proprietary business information belonging to non-
27 parties SIP and/or Pineboard; (d) the Request is more appropriately directed toward
28

1 non-parties SIP and/or Pineboard, and not to Jam; (e) the Request seeks information
2 that is protected from disclosure by the attorney-client privilege, the attorney work
3 product doctrine, and/or the common interest privilege, both in this action and in
4 other related actions filed by Plaintiff and/or Plaintiff's affiliate; and (f) the Request
5 seeks documents that are not relevant to Plaintiff's claim.

6 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

7 After a diligent search and reasonable inquiry, Jam responds that he has no documents
8 in his possession, custody or control responsive to this Request.

9 **INTERROGATORY NO. 21:** Identify all transfers of funds received by Broadway
10 4D Theaters from SIP since December 1, 2010, including the date, amount and
11 purpose of each such transfer, and the consideration (i.e., goods, services, etc.) that
12 SIP received in exchange therefor.

13
14 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

15 (a) the Interrogatory is overbroad as to time because it seeks information outside of
16 the relevant time period; (b) the Interrogatory is more properly directed at non-parties
17 SIP and/or Broadway 4D Theaters ("Broadway"), and not to Jam; and (c) the
18 Interrogatory seeks information that is not relevant to Plaintiff's claim.

19 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

20 Jam has no information or knowledge with regard to the subject matter of the above
21 Interrogatory

22 **REQUEST FOR PRODUCTION NO. 34:** All documents and communications
23 concerning or relating to your response to the preceding interrogatory.

24
25 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
26 the Request is overbroad as to time in that it seeks information outside of the relevant
27 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
28 whether the Request seeks all documents and communications relating to the transfers

1 identified in response to Interrogatory No. 21 or if the Request only seeks documents
2 and communications sufficient to identify the transfers identified in response to
3 Interrogatory No. 21; (c) to the extent the Request seeks all documents and
4 communications relating to all transfers, including the purpose of the transfers, the
5 Request seeks confidential and proprietary business information belonging to non-
6 parties SIP and/or Broadway; (d) the Request is more appropriately directed toward
7 non-parties SIP and/or Broadway, and not to Jam; (e) the Request seeks information
8 that is protected from disclosure by the attorney-client privilege, the attorney work
9 product doctrine, and/or the common interest privilege, both in this action and in
10 other related actions filed by Plaintiff and/or Plaintiff's affiliate; and (f) the Request
11 seeks documents that are not relevant to Plaintiff's claim.

12 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

13 After a diligent search and reasonable inquiry, Jam responds that he has no documents
14 in his possession, custody or control responsive to this Request.

15 **INTERROGATORY NO. 22:** Identify all transfers of funds received by Henry N.
16 Jannol and/or the Law Offices of Henry N. Jannol from SIP since December 1, 2010,
17 including the date, amount and purpose of each such transfer, and the consideration
18 (i.e., goods, services, etc.) that SIP received in exchange therefor.
19

20 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:

21 (a) the Interrogatory is overbroad as to time because it seeks information outside of
22 the relevant time period; (b) the Interrogatory is more properly directed at non-parties
23 SIP and/or Henry N. Jannol and/or the Law Offices of Henry N. Jannol ("collectively
24 "Jannol"), and not to Jam; (c) the Interrogatory seeks information that is protected
25 from disclosure by the attorney-client privilege, the attorney work product doctrine,
26 and/or the common interest privilege, both in this action and in related actions filed
27 by Plaintiff and/or Plaintiff's affiliate; and (d) the Interrogatory seeks information that
28 is not relevant to Plaintiff's claim.

1 **REQUEST FOR PRODUCTION NO. 35:** All documents and communications
2 concerning or relating to your response to the preceding interrogatory.

3 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
4 the Request is overbroad as to time in that it seeks information outside of the relevant
5 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
6 whether the Request seeks all documents and communications relating to the transfers
7 identified in response to Interrogatory No. 22 or if the Request only seeks documents
8 and communications sufficient to identify the transfers identified in response to
9 Interrogatory No. 22; (c) to the extent the Request seeks all documents and
10 communications relating to all transfers, including the purpose of the transfers, the
11 Request seeks confidential and proprietary business information belonging to non-
12 parties SIP and/or Jannol; (d) the Request is more appropriately directed toward non-
13 parties SIP and/or Jannol, and not to Jam; (e) the Request seeks information that is
14 protected from disclosure by the attorney-client privilege, the attorney work product
15 doctrine, and/or the common interest privilege, both in this action and in other related
16 actions filed by Plaintiff and/or Plaintiff's affiliate; and (f) the Request seeks
17 documents that are not relevant to Plaintiff's claim.

18 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

19 After a diligent search and reasonable inquiry, Jam responds that he has no documents
20 in his possession, custody or control responsive to this Request.
21

22 **INTERROGATORY NO. 23:** Identify all transfers of funds received by any other
23 third-party not identified in the preceding Interrogatory Nos. 15 through 22 from SIP
24 since December 1, 2010, including the date, amount and purpose of each such
25 transfer, and the consideration (i.e., goods, services, etc.) that SIP received in
26 exchange therefor.

27 **RESPONSE:** Jam specifically objects to this Interrogatory on the following grounds:
28 (a) the Interrogatory is overbroad as to time in that it seeks information outside of the

1 relevant time period; (b) the Interrogatory is overbroad as to scope because it seeks
2 information regarding all transfers of funds from SIP; (c) the Interrogatory seeks
3 information that is not relevant to Plaintiff's claims; and (d) the Interrogatory is
4 unduly burdensome, oppressive, and designed solely to harass.

5 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

6 Jam has no information or knowledge with regard to the subject matter of the above
7 Interrogatory.

8 **REQUEST FOR PRODUCTION NO. 36:** All documents and communications
9 concerning or relating to your response to the preceding interrogatory.

10
11 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
12 the Request is overbroad as to time in that it seeks information outside of the relevant
13 time period; (b) the scope of the Request is vague and ambiguous in that it is not clear
14 whether the Request seeks all documents and communications relating to the transfers
15 identified in response to Interrogatory No. 23 or if the Request only seeks documents
16 and communications sufficient to identify the transfers identified in response to
17 Interrogatory No. 23; (c) to the extent the Request seeks all documents and
18 communications relating to all transfers, including the purpose of the transfers, the
19 Request seeks confidential and proprietary business information belonging to non-
20 party SIP and/or the unidentified third parties; (d) the Request is more appropriately
21 directed toward non-party SIP and/or the unidentified third parties, and not to Jam; (e)
22 the Request seeks information that is protected from disclosure by the attorney-client
23 privilege, the attorney work product doctrine, and/or the common interest privilege,
24 both in this action and in other related actions filed by Plaintiff and/or Plaintiff's
25 affiliate; and (f) the Request seeks documents that are not relevant to Plaintiff's claim.

26 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

27 After a diligent search and reasonable inquiry, Jam responds that he has no documents
28

1 in his possession, custody or control responsive to this Request.

2 **REQUEST FOR PRODUCTION NO. 37:** True and correct copies of the state and
3 federal tax returns filed by you or on your behalf for the preceding seven (7) annual
4 reporting periods.

5 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
6 the Request seeks disclosure of personal, private, and confidential information
7 belonging to Jam, the disclosure of which would invade Jam's privacy rights; (b) the
8 Request seeks documents that are privileged; (c) the Request seeks documents that are
9 not relevant to Plaintiff's claims; and (d) the Request is overbroad in that it seeks
10 information outside of the relevant time period.

11 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

12 Jam will not produce said requested documents.

13
14 **REQUEST FOR PRODUCTION NO. 38:** True and correct copies of the state and
15 federal tax returns filed by SIP for the preceding seven (7) annual reporting periods.

16 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
17 the Request is more properly directed to non-party SIP, and not to Jam; (b) the
18 Request is overbroad as to time because it seeks information outside of the relevant
19 time period; (c) the Request seeks information that is not relevant to Plaintiff's claim;
20 and (d) the Request seeks confidential financial information belonging to SIP, which
21 are subject to a privilege in favor of SIP.

22 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

23 After a diligent search and reasonable inquiry, Jam responds that he has no documents
24 in his possession, custody or control responsive to this Request.
25

26
27 **REQUEST FOR PRODUCTION NO. 39:** All documents and communications
28

1 between you and Swartz, Bergstein and/or Grunfeld concerning or relating to the tax
2 returns of SIP.

3 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
4 the Request seeks information protected from disclosure by the attorney-client
5 privilege, the attorney work product doctrine, and/or the common interest doctrine,
6 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
7 (b) the Request is vague and ambiguous as to time because it does not identify a
8 relevant time period; (c) the Request seeks information that is not relevant to
9 Plaintiff's claims; and (d) the Request seeks confidential financial information
10 belonging to SIP.

11 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
12 After a diligent search and reasonable inquiry, Jam responds that he has no documents
13 in his possession, custody or control responsive to this Request.
14

15 **REQUEST FOR PRODUCTION NO. 40:** All documents and communications
16 between you and every accountant who prepared SIP's tax returns for the preceding
17 seven (7) annual reporting periods.

18 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
19 the Request seeks information protected from disclosure by the attorney-client
20 privilege, the attorney work product doctrine, and/or the common interest doctrine,
21 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
22 (c) the Request is vague and ambiguous as to time because it does not identify a
23 relevant time period; (d) the Request seeks information that is not relevant to
24 Plaintiff's claims; and (e) the Request seeks confidential financial information
25 belonging to SIP.

26 Subject to, and without waiving, the foregoing objections, Jam responds as follows:
27 After a diligent search and reasonable inquiry, Jam responds that he has no documents
28

1 in his possession, custody or control responsive to this Request.

2 **REQUEST FOR PRODUCTION NO. 41:** All engagement contracts between SIP
3 and every accountant or tax preparer who prepared SIP's tax returns for the preceding
4 seven (7) annual reporting periods.

5 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
6 the Request seeks information protected from disclosure by the attorney-client
7 privilege, the attorney work product doctrine, and/or the common interest doctrine,
8 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
9 (c) the Request is vague and ambiguous as to time because it does not identify a
10 relevant time period; and (d) the Request seeks information that is not relevant to
11 Plaintiff's claims.

12 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

13 After a diligent search and reasonable inquiry, Jam responds that he has no documents
14 in his possession, custody or control responsive to this Request.

15
16 **REQUEST FOR ADMISSION NO. 7:** Admit that on or about February 8, 2013, by
17 way of the forfeiture annexed hereto as Exhibit D (Bates-labeled WF1925), the
18 Secretary of State for the State of Texas, forfeited SIP's certificate of formation.

19 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
20 the Request is more appropriately directed to SIP, and not to Jam.

21 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

22 Jam admits that based on the publicly available document, a copy of which is attached
23 as Exhibit D, the Secretary of State for the State of Texas, appears to have forfeited
24 the "charter, certificate or registration of Advisory IP Services, Inc."
25
26
27
28

1 **REQUEST FOR PRODUCTION NO. 42:** All documents and communications
2 concerning or relating to your response to the preceding request for admission.

3 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
4 the Request seeks information that is protected from disclosure by the attorney-client
5 privilege, the attorney work product doctrine, and/or the common interest doctrine,
6 both in this action and in related actions filed by Plaintiff and/or Plaintiff's affiliate;
7 (b) the Request seeks information that is not relevant to Plaintiff's claims; and (d) the
8 Request is more appropriately directed to non-party SIP, not to Jam.

9 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

10 After a diligent search and reasonable inquiry, Jam responds that he has no documents
11 in his possession, custody or control responsive to this Request.
12

13 **REQUEST FOR ADMISSION NO. 8:** Admit that SIP has made no effort to set
14 aside the forfeiture annexed hereto as Exhibit B (Bates-labeled WF1925).

15 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
16 the Request is vague and ambiguous as to the meaning of the phrase "made no
17 effort;" and (b) the Request is more appropriately directed at non-party SIP, not to
18 Jam.

19 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

20 Jam has no information as to any efforts SIP might have made or not to set aside the
21 forfeiture as referenced in the Request.
22

23 **REQUEST FOR PRODUCTION NO. 43:** All documents and communications
24 concerning or relating to your response to the preceding request for admission.

25 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
26 the Request is vague and ambiguous as to the meaning of the undefined phrase "made
27 no effort;" (b) the Request is more appropriately directed at non-party SIP, not to
28 Jam; (c) the Request seeks information that is protected from disclosure by the

1 attorney-client privilege, the attorney work product doctrine, and/or the common
2 interest privilege, both in this action and in related actions filed by Plaintiff and/or
3 Plaintiff's affiliate; and (d) the Request seeks information that is not relevant to
4 Plaintiff's claims.

5 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

6 After a diligent search and reasonable inquiry, Jam responds that he has no documents
7 in his possession, custody or control responsive to this Request.

8 **REQUEST FOR PRODUCTION NO. 44:** All non-privileged documents and
9 communications, concerning or relating to the Breach-of-Contract Lawsuit.

10
11 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
12 the scope of the Request is vague, ambiguous, and overbroad; (b) the Request seeks
13 information that is not relevant to Plaintiff's claim; (c) the Request is vague,
14 ambiguous, and overbroad as to time because it does not specify the time period for
15 which the documents are sought; (d) the Request is more appropriately directed to
16 non-party SIP, and not to Jam; and (e) the Request is unduly burdensome, oppressive,
17 and designed solely to harass.

18 **REQUEST FOR PRODUCTION NO. 45:** All engagement contracts between SIP
19 and attorneys or law firms who were retained to provide legal services to SIP.

20 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
21 the Request seeks information that is not relevant to Plaintiff's claim; (b) the Request
22 seeks information which is protected from disclosure by the attorney-client privilege,
23 the attorney work product doctrine, and/or the common interest privilege, both in this
24 action and in related actions filed by Plaintiff and/or Plaintiff's affiliate; (c) the
25 Request is vague, ambiguous, and overbroad as to time in that it does not specify the
26 time period for which documents are sought; and (d) the Request is more
27 appropriately directed at non-party SIP and/or its attorneys, and not to Jam.
28

1 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

2 After a diligent search and reasonable inquiry, Jam responds that he has no documents
3 in his possession, custody or control responsive to this Request.

4 **REQUEST FOR PRODUCTION NO. 46:** To the extent not previously produced,
5 all non-privileged communications relating to the Fund, the NPA, SIP and/or the
6 Lawsuit.

7 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
8 the scope of the Request is vague, ambiguous, and overbroad; (b) the Request seeks
9 information that is not relevant to Plaintiff's claims; (c) the Request is more
10 appropriately directed at non-party SIP; (d) the Request is vague, ambiguous, and
11 overbroad as to time because it does not specify the time period for which documents
12 are sought; and (e) the Request is unduly burdensome, oppressive, and designed
13 solely to harass.
14

15 **INTERROGATORY NO. 24:** Identify any person, except for your legal counsel
16 and his/her staff, who has supplied information or in any way assisted with the
17 preparation of your responses to the interrogatories contained in this First Set of
18 Combined Written Discovery to *Kiarash K. Jam*.

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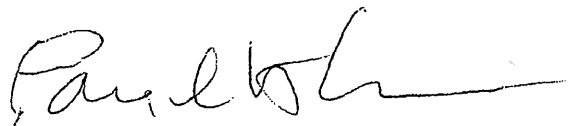
1 **RESPONSE:** Jam specifically objects to this Request on the following grounds: (a)
2 the Interrogatory seeks information that is not relevant to Plaintiff's claim.

3 Subject to, and without waiving, the foregoing objections, Jam responds as follows:

4 None.
5
6

7 Dated: May 16, 2016

LAW OFFICES OF HENRY N. JANNOL
A PROFESSIONAL CORPORATION

9
10 By: 
11 Paul H. Levine
12 Attorneys for Defendant Kiarash K. Jam
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PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 10850 Wilshire Boulevard, Suite 825, Los Angeles, California 90024-4644. On May 16, 2016, I served the foregoing document(s) described as follows::

**DEFENDANT KIARASH JAM'S SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST SET OF COMBINED WRITTEN DISCOVERY**

☐

by transmitting via electronic transmission the document(s) listed above to the email(s) maintained by the recipient(s) with the State Bar of California, or provided by such recipients, on this date before 5:00 p.m., with no indication of any error in transmission.

☒

by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.

☐

by causing said above-referenced document(s) to be personally delivered to the addressee set forth below.

☐

by overnight courier for delivery the next business morning of the document(s) listed above to the person(s) at the address(es) set forth below.

☐

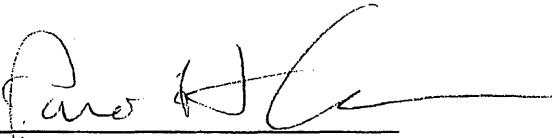
by electronically filing the foregoing with the Clerk of the District Court using its ECF System pursuant to the Electronic Case Filing provision of the United States District Court General Order and the E-Government Act of 2002, which electronically notifies said parties in this case: See attached sheet.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I am a member of the bar of this Court.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on May 16, 2016, at Los Angeles, California.



Paul H. Levine

PROOF OF SERVICE

SERVICE LIST

THE Wimpledon Funds, SPC (Class TT), vs Graybox, LLC; et al.,
USDC CASE NO. 2:15-CV-6633-CAS-AJWx

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